

**UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK**

STEPHANIE JONES, et al.,

*Plaintiffs,*

v.

JENNIFER ABEL, et al.,

*Defendants.*

No. 1:25-cv-00779-LJL  
[rel. 1:24-cv-10049-LJL]

**DECLARATION OF JON R. FETTEROLF IN SUPPORT OF NON-PARTY VANZAN  
INC’S OPPOSITION TO DEFENDANT JENNIFER ABEL’S LETTER MOTION TO  
COMPEL COMPLIANCE WITH DOCUMENT SUBPOENA**

I, Jon R. Fetterolf, pursuant to 28 U.S.C. § 1746, declare as follows:

1. I am a partner at Zuckerman Spaeder LLP, and I represent non-party Vanzan Incorporated (“Vanzan”) as an attorney of record in this case.

2. I submit this declaration in support of Vanzan’s opposition to Defendant Jennifer Abel’s (“Defendant”) letter motion to compel compliance with a document subpoena served on Vanzan on April 21, 2025 (the “Subpoena”).

3. Attached hereto as Exhibit 1 is a true and correct copy of email correspondence between counsel for Vanzan and counsel for Defendant, dated from May 9, 2025 through May 30, 2025.

4. Attached hereto as Exhibit 2 is a true and correct copy of Vanzan’s Objections and Responses to Defendant’s Subpoena, dated May 16, 2025.

5. On May 27, 2025, as counsel for Vanzan, I, along with Margarita O’Donnell and Naomi Bates, attended a nearly hour-long virtual meet and confer regarding the Subpoena with

counsel for Defendant from the law firms Liner Freedman Taitelman + Cooley LLP and Meister Seelig & Fein where the parties' respective positions were discussed.

6. On May 27, 2025, Jason Sunshine, attorney from Liner Freedman Taitelman + Cooley LLP, memorialized Defendant's proposal from the meet and confer to withdraw certain Subpoena requests and narrow four of the remaining five requests.

7. On May 30, 2025, Margarita O'Donnell, attorney from Zuckerman Spaeder LLP, responded to Mr. Sunshine's May 27 email and reiterated Vanzan's relevance objections, its proposal to produce documents responsive to the subpoena at issue in Request Nos. 10 and 11, and Vanzan's request for Defendant to confirm whether she had already received documents in response to Request Nos. 10 and 11. Counsel for Defendant did not respond to this email.

8. On June 24, 2025, more than three weeks after the May 30 email and without further correspondence, Defendant filed the letter motion to compel (ECF No. 69).

I declare under penalty of perjury that the foregoing is true and correct.

Executed on June 26, 2025 in Cape May, NJ.

/s/ Jon R. Fetterolf

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